

REMARKS

Currently pending claims 10-25 and 27-30 are for consideration by the Examiner.

The Examiner objected to claims 11-16, 20, 21, and 24-27 because of claim informalities. In response, Applicants have amended claims 11-16, 20, 21, and 24-27 to clarify the invention. Said amendments to claims 11-16, 20, 21, and 24-27 are not substantially related to patentability.

The Examiner rejected claims 10, 11, 14, 16, 20, 24, and 26-29 under 35 U.S.C. §102(b) as being anticipated by Nishimura et al. (USPAT 5604380, Nishimura).

The Examiner rejected claims 10 and 17-19 under 35 U.S.C. §102(b) as being anticipated by Kozono (USPAT 5619070, Kozono).

The Examiner rejected claims 12 and 25 under 35 U.S.C. §103(a) as being unpatentable over Nishimura as applied to claim 10 above, and further in view of Chen et al. (USPAT 5413950, Chen).

The Examiner rejected claim 13 under 35 U.S.C. §103(a) as being unpatentable over Nishimura as applied to claim 10 above, and further in view of Nishino et al. (USPAT 5586385, Nishino).

The Examiner rejected claim 15 under 35 U.S.C. §103(a) as being unpatentable over Nishimura as applied to claim 10 above, and further in view of Ichinose et al. (USPAT 5681402, Ichinose).

The Examiner rejected claim 21 under 35 U.S.C. §103(a) as being unpatentable over Nishimura as applied to claim 10 above, and further in view of Robeson et al. (GB PAT 2297503, Robeson).

The Examiner rejected claims 22 and 23 under 35 U.S.C. §103(a) as being unpatentable

over Nishimura as applied to claim 10 above, and further in view of one of ordinary skill in the art.

Applicants respectfully traverse the §102 and §103 rejections with the following arguments.

35 U.S.C. §102

Nishimura

The Examiner rejected claims 10, 11, 14, 16, 20, 24, and 26-29 under 35 U.S.C. §102(b) as being anticipated by Nishimura et al. (USPAT 5604380, Nishimura). The Examiner alleges that "Nishimura discloses in figure 2a a method for forming an electronic structure. Nishimura discloses in figure 2a providing a metallic plate (3). Nishimura discloses in figure 2a forming a mineral layer (4) on the metallic plate. Nishimura discloses in figure 2a an adhesion promoter layer (5) on the mineral layer."

Applicants respectfully contend that Nishimura does not anticipate claims 10, 28, and 29 because Nishimura et al. does not teach each and every feature of claims 10, 28, and 29. For example, Nishimura does not teach "providing a metallic plate such that all exterior surfaces the metallic plate are exposed". In contrast, Nishimura teaches depositing an Al film on the semiconductor substrate 1 to form the metallic plate (3) (see Nishimura, col. 10, lines 26-29). Thus, the metallic plate (3) that is so formed is not provided as having all of its exterior surfaces exposed as required by claim 10.

Based on the preceding argument, Applicants respectfully maintain that Nishimura does not anticipate claims 10, 28, and 29, and that claims 10, 28, and 29 are in condition for allowance. Since claims 11, 14, 16, 20, 24, and 27 depend from claim 10, Applicants contend that claims 11, 14, 16, 20, 24, and 27 are likewise in condition for allowance.

Applicants respectfully contend that the rejection of claim 26 is moot since claim 26 has been cancelled.

Kozono

The Examiner rejected claims 10 and 17-19 under 35 U.S.C. §102(b) as being anticipated by Kozono (USPAT 5619070, Kozono). The Examiner alleges that "Kozono discloses in figure 2a a method for forming an electronic structure. Kozono discloses in figure 2a providing a metallic plate (15). Kozono discloses in figure 2a forming a mineral layer (14) on the metallic plate. Kozono discloses in figure 2a an adhesion promoter layer (13) on the mineral layer."

Applicants respectfully contend that Kozono does not anticipate claim 10, because Kozono does not teach each and every feature of claim 10.

As a first reason why Kozono does not teach each and every feature of claim 10, Kozono does not teach "forming a mineral layer on the metallic plate". Applicants respectively contends that Kozono does not teach that the adhesive 14 is a mineral layer as alleged by the Examiner. Since Kozono does not disclose any material composition for the adhesive 14, one may not conclude that Kozono teaches that the adhesive 14 is a mineral layer.

As a second reason why Kozono does not teach each and every feature of claim 10, Kozono does not teach "forming an adhesion promoter layer on the mineral layer". Applicants respectively contends that the mounting plate 13 is not an adhesion promoter as alleged by the Examiner. Instead, the mounting plate 13 is a plate structure having two plates, namely plates 13-1 and 13-2 as shown in FIG. 2B and described in col. 4, lines 3-20. Plate 13-1 is an insulating plate made of a ceramic material and plate 13-2 is a metal layer (see Kozono, col. 4, lines 5-6, 11-13), which confirms that the mounting plate 13 does not have the functionality of adhesion promotion. Therefore, one may not conclude that Kozono teaches that the mounting plate 13 is an adhesion promoter layer.

As a third reason why Kozono does not teach each and every feature of claim 10, Kozono does not teach forming the steps of “providing a metallic plate such that all exterior surfaces the metallic plate are exposed; forming a mineral layer on the metallic plate; and forming an adhesion promoter layer on the mineral layer”, **“in the indicated sequential order”** (emphasis added). For example, Kozono does not teach performing the step of “forming an adhesion promoter layer on the mineral layer” **after** performing the step of “forming a mineral layer on the metallic plate” as required by claim 10. Kozono teaches in col. 3, lines 46-48 that “[t]he semiconductor chip mounting plate 13 is fixed to a heat radiating plate 15 made of Cu or the like, by means of the adhesive 14”, which is not a teaching that the mounting plate 13 is formed on the adhesive layer 14 after the adhesive layer 14 is formed on the radiating plate 15.

Based on the preceding arguments, Applicants respectfully maintain that Kozono does not anticipate claim 10, and that claim 10 is in condition for allowance. Since claims 17-19 depend from claim 10, Applicants contend that claims 17-19 are likewise in condition for allowance.

35 U.S.C. §103

The Examiner rejected claims 12, 13, 15, 21, 22, 23, and 25, under 35 U.S.C. §103(a).

Since claims 12, 13, 15, 21, 22, 23, and 25 depend from claim 10, which Applicants have argued *supra* to be patentable under 35 U.S.C. §102, Applicants maintain that claims 12, 13, 15, 21, 22, 23, and 25 are not unpatentable under 35 U.S.C. §103(a).

CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims 10-29 and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below.

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MAY 02 2003

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